



**UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**



**STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378**

Captain Marc Delao
Regional Engineer
Navy Region Hawaii
850 Ticonderoga St. STE 110
Joint Base Pearl Harbor Hickam, Hawaii 96860

**Re: Approval to revise schedule for deliverables 6.3- Investigation and Remediation of
Releases Report and 7.1.3.- Groundwater Flow Model Report of the Red Hill
Administrative Order on Consent ("AOC") Statement of Work ("SOW")**

Dear Captain Delao:

The U.S. Environmental Protection Agency ("EPA") and Hawaii Department of Health ("DOH"), collectively the "Regulatory Agencies", have received the U.S. Department of Navy's ("Navy's") letter dated October 12, 2018, and are approving the Navy's request for a ten-month extension to the Red Hill AOC SOW Sections 6.3 and 7.1.3. The Navy shall use this extension to address Regulatory Agency concerns outlined in our XX date letter to Mr. Mark Manfredi, and meet intermediary milestones to ensure that substantial progress is made during this 10-month extension.

Recommended Schedule for Navy's Extension

The Regulatory Agencies recommend the following schedule during this extension to address the issues detailed in our August 14-16 meetings with the Navy, our XX DATE letter and other concerns highlighted in previous technical meetings. The Navy should consider providing additional opportunities for focused technical discussion with the AOC parties and/or external Subject Matter Experts remotely or in person, as needed to reach agreement on key technical decisions well in advance of deliverable submission.

Recommended Schedule for Navy Extension	
Date	Task
November 2018	Kickoff Meeting with Agencies
November – March 2019	Data Evaluation, CSM Updates and GFM, Fate and Transport Updates
April 2019	Review with Regulatory Agencies and External SMEs Updates to the CSM, Interim GFM, and F&T
May – June 2019	Continue GFM Updates and Predictive Simulations
July 2019	Presentation of Draft Deliverable to Subject Matter Experts
October 2019	Final Section 6.3 and 7.1.3 Deliverable Submittals

Response Requested

The Regulatory Agencies concur with the Navy that the deliverables required per Section 6.3 and 7.1 of the Red Hill AOC SOW shall be submitted to us no later than October 5, 2019. The Regulatory Agencies require that the Navy respond to this letter via letter or email by November 16, 2018 with a proposed schedule over the course of the extension and to confirm receipt of this extension approval. The Navy's schedule should include dates where it expects to seek agreement with the Regulatory Agencies on key issues prior to submitting the final deliverables.

The Regulatory Agencies also encourage the Navy to concurrently continue its efforts to install more groundwater monitoring wells to further improve its modeling efforts. We look forward to your response to this letter and the upcoming environmental work required as part of the AOC. Please let us know if you have any comments or concerns with the information in this letter.

Sincerely,

Omer Shalev
Project Coordinator
EPA Region 9 Land Division

Roxanne Kwan
Interim Project Coordinator
DOH Solid and Hazardous Waste Branch

Enclosures: Attachment 1- Navy letter to EPA Region 9 and DOH dated October 12, 2018
Attachment 2- Regulatory Agency letter to Navy dated XX 2018

cc: Mr. Mark Manfredi, Navy (via email)
Mr. Aaron Poentis, Navy (via email)
Mr. Cory Waki, Navy (via email)

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